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**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Derek Houston,

Plaintiff,

vs.

FCA US, LLC d/b/a Ram,

Defendant.

Case No.: 2:19-cv-05229-JJT

**STATUS REPORT AND
STIPULATION FOR EXTENSION
OF ORDER FOR DISMISSAL WITH
PREJUDICE**

(Third / Final Request)

Pursuant to LRCiv. 7.3(a) and the Parties' Notice of Settlement (Doc. 22), Defendant FCA US LLC ("Defendant") and Plaintiff Derek Houston ("Plaintiff") hereby stipulate and request an extension of this matter before the Court dismisses the action with prejudice for an additional twenty-three (23) days, up to and including July 17, 2020.

This Stipulation comes in light of the unexpected ramifications of the COVID-19 outbreak that have inhibited the Defendant's ability to effectuate its obligations under the settlement agreement the Parties entered into. In particular, the parties are at a point now where there is a specific date on which the settlement can be finalized. As a result, the Parties have agreed that an extension of twenty-three additional days is the best means of ensuring that the settlement agreement's provisions are upheld, before the Court enters its order for dismissal with prejudice. The Parties will file another status report with the

1 Court stating why an order to dismiss with prejudice cannot be filed, if necessary.
2 Accordingly, the Parties respectfully request the Court withhold its order for dismissal
3 with prejudice an additional twenty-three (23) days, up to and including July 17, 2020.
4

5 DATED this 24th day of June, 2020.

6 **CLARK HILL PLC**

7 By: s/ Christopher T. Curran
8 Darrell E. Davis
9 Christopher T. Curran
10 *Attorneys for Defendant FCA US LLC*

11 **AMAR LAW GROUP PLLC**

12 By: s/ Henry Vorderbruggen (with permission)
13 Henry Vorderbruggen
14 Shalev Amar
15 *Attorneys for Plaintiff*
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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing, and transmittal of a Notice of Service of Electronic Filing to the following CM/ECF registrants:

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By: s/ Joyce Johnston